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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

DECLARATION OF KAREN JEFFERIES

DECLARATION OF KAREN JEFFERIES

I, Karen Jefferies, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the Chair of Bargaining for Unit 4 of the Service Employees International Union Local 1000 ("Local 1000"). I have been the Unit 4 bargaining chair for 8 years and, in that role, negotiate new contracts and bargain over changes to existing contracts. For that reason, I am intimately familiar with the work duties of all Unit 4 members. I have also been a member and union steward of Local 1000 for 28 years. I currently work with the Criminal Record Update Section of the California Department of Justice.

3. Local 1000 is the largest public sector union in California, and represents 96,000 members employed by the State of California in communities across the state. Bargaining Unit 4 is comprised of roughly 19,000 office and allied workers staffed across many of California's state agencies. These agencies include the California Correctional Health Care Services, California Department of Motor Vehicles, California Department of Justice, California Employment Development Department, California Department of Tax and Fee Administration, California State Lottery, State of California Insurance Fund, California State Library, California Department of Corrections and Rehabilitation, California Department of Industrial Relations, California Department of Social Services, California Department of Veterans Affairs, California Health Benefit Exchange, California Department of Consumer Affairs, and State Controller's Office. Members hold diverse roles in these state agencies, including office assistant, secretary, data entry staff, and technical assistant. Members of Bargaining Unit 4 work across the state of California, and are employed in most California counties. 1,200 members of Bargaining Unit 4 live and/or work in San Francisco, Oakland, and elsewhere in the Bay Area.

4. Through my work, I am familiar with the broad range of jobs that Unit 4 members perform and the ways in which their jobs rely on federal support, and the impacts that largescale reductions in force may have on membership and the provision of public services. The

1 information below provides examples of how efforts to reorganize, and significantly reduce, the
2 federal government will harm Unit 4 members and California residents.

3 5. The California Employment Development Department (“EDD”) administers state
4 Unemployment Insurance, Disability Insurance, and Paid Family Leave programs. The purpose of
5 Unemployment Insurance is to provide temporary wage replacement to individuals who are
6 unemployed through no fault of their own, including former federal employees. EDD also collects
7 unemployment insurance tax and state payroll tax.

8 6. Many Local 1000 members are employed by EDD, including over 600 Unit 4
9 members. Unit 4 members are employed as Program Technicians and Office Technicians. In
10 these roles, Unit 4 members staff EDD’s call centers, process portions of unemployment claims,
11 and perform general administrative functions to ensure offices are functioning properly. Unit 4
12 members working for EDD live and work across the state of California, including many that live
13 and work in the San Francisco Bay Area.

14 7. I understand that the federal government is planning to institute a largescale
15 reduction in force. I understand that this reduction in force would involve cutting tens-of-
16 thousands of federal positions. These cuts will wreak havoc on Unit 4 members and cause
17 irreparable harm to bargaining unit members and California residents.

18 8. In early 2018, EDD had adequate staff to process applications for unemployment
19 insurance, and call center staff could handle the call volume. Unit 4 members regularly worked 40
20 hours per week Monday through Friday, with occasional voluntary overtime. And EDD was also
21 able to process most requests in a timely manner.

22 9. But, in late 2018 and early 2019, the United States Federal Government shutdown
23 briefly. During the shutdown, many federal employees experienced temporary furloughs, or were
24 required to work without pay. During that period, the EDD received an unprecedented influx in
25 applications for unemployment insurance and calls to EDD call centers, largely from then-
26 unemployed federal workers and other workers affected by the shutdown. The EDD did not hire
27 additional employees. Instead, EDD asked its employees, including Unit 4 members, to work
28

1 overtime. Many members regularly worked 80 hours per week, and did so for multiple months.
2 Over that period, I received many complaints from bargaining members who were suffering from
3 burnout.

4 10. Despite this grueling work schedule, EDD quickly fell behind on processing
5 unemployment claims. Thousands of claims went unprocessed, a backlog that took months to
6 clear. Many applicants went more than six months without unemployment benefits. Wait times at
7 EDD call centers also increased substantially.

8 11. Based on my experience, I expect the planned reduction in force to wreak
9 considerably more havoc on Local 1000 members, including members of Unit 4, and the EDD
10 than the limited government shutdown that took place in 2018/2019. The proposed reductions in
11 force are vast, affecting a large share of the federal workforce. Any reduction in force will cause,
12 almost immediately, a vast increase in work for Unit 4 members and other EDD employees. And,
13 unlike the shutdown, which lasted a little more than a month, the reductions in force will
14 permanently remove federal positions. Unless enjoined, I expect that the reductions in force will
15 cause a dramatic increase in unemployment claims that will last many months. EDD will likely
16 ask, and perhaps require, that Unit 4 and/or other Local 1000 members work overtime. Based on
17 my experience, I believe that Unit 4 and other Local 1000 members will suffer from burnout. I
18 also expect that resultant backlogs will cause California residents' unemployment claims to
19 languish for months or years, which will delay Californian's receipt of critical unemployment
20 benefits.

21 12. The California Department of Motor Vehicles ("DMV") registers motor vehicles
22 and issues driver's licenses in the state of California. 4,700 Unit 4 members are employed by the
23 DMV as Motor Vehicle Representatives, Motor Vehicle Technicians, and Control Cashiers. In
24 these roles, members process documents, explain DMV policies and procedures to members of the
25 public in call centers and in the field, and process payments to the DMV. The DMV relies on
26 applicant social security numbers when issuing driver's licenses. The EDD, similarly, relies on
27 social security numbers when processing claims to reduce fraud and waste. I also understand that
28

1 California residents often must interact with the Social Security Administration when they
2 experience problems with their social security number.

3 13. I understand, from speaking with Unit 4 members and reading reputable reporting,
4 that the Social Security Administration is understaffed. *See Exhibit A.* California residents are
5 facing long delays in speaking with Social Security Administration staff and resolving problems
6 with their social security numbers. And these delays are in turn delaying the provision of state
7 services, including driver's licenses and unemployment/disability insurance.

8 14. I understand, again from reading reporting, that the Social Security Administration
9 plans to cut another 7,000 employees. *See Exhibit A.* These cuts will invariably worsen the
10 current staffing shortage and prolong the delays that plague the Social Security Administration.
11 These cuts will make it even more difficult for DMV and EDD staff to do their jobs, process
12 applications, and render important services to Californians. Americans relying on social security,
13 and Californians relying on state services that depend upon the Social Security Administration,
14 will undoubtedly suffer.

15
16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct. Executed April 29, 2025, in Sacramento, California.

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19 

20 KAREN JEFFERIES
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Exhibit A

‘Just a Mess’: Staff Cuts, Rushed Changes and Anxiety at Social Security

President Trump promised not to touch Social Security, but as Elon Musk’s team trims staff and plans cuts to phone services, the system is groaning under the pressure.



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By Jack Healy, Alexandra Berzon, Tara Siegel Bernard and Nicholas Nehamas

Jack Healy reported from Glendale, Ariz.; Alexandra Berzon from Los Angeles; Tara Siegel Bernard from New York; and Nicholas Nehamas from Washington, D.C.

April 8, 2025

The line started forming outside the Social Security office in suburban Glendale, Ariz., not long after sunrise, dozens of retirees and people with disabilities, shuffling papers, some leaning on walkers, all anxious to know whether President Trump’s government overhaul had put their safety nets at risk.

When 9 a.m. came, an employee emerged from the building with fliers asking the crowd to come back — once they had scheduled an appointment.

“I’ve called for days!” one woman yelled.

“We came from a long ways away,” said another. Still another let everyone know they had been handed a load of bunk, though she used a more colorful term.

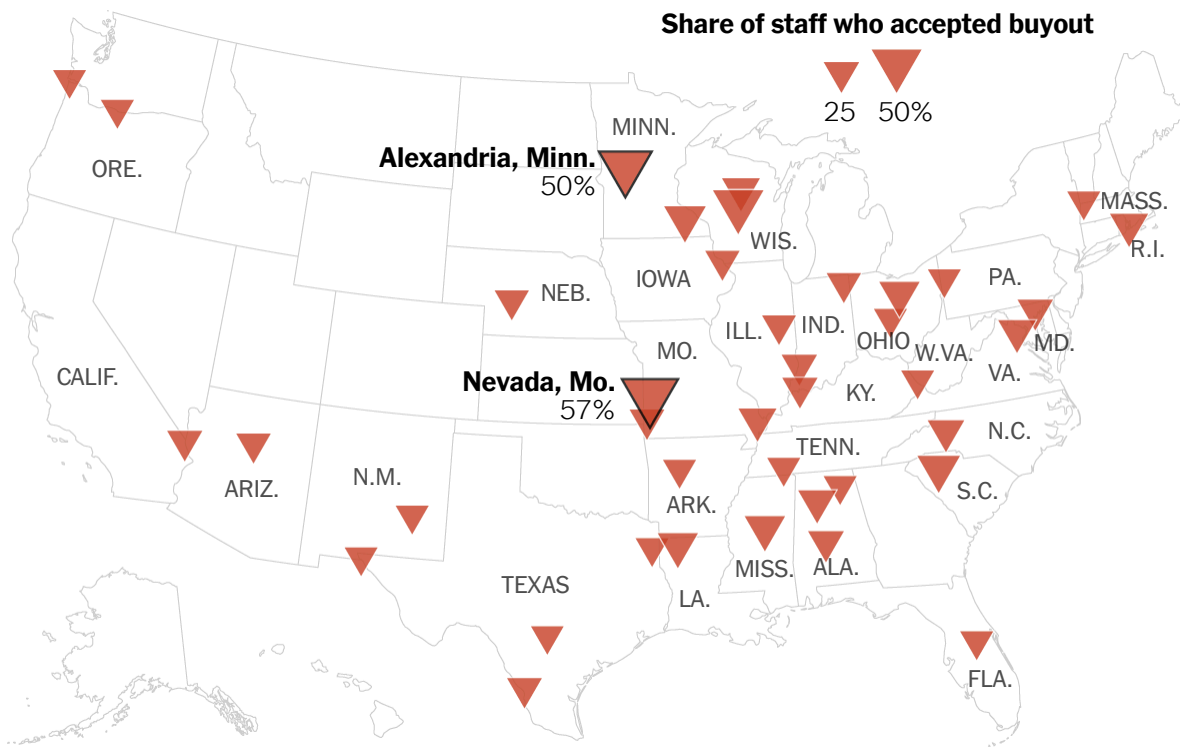
With the stock market in turmoil and the economy under threat, beneficiaries might see their monthly Social Security checks as predictable amid the chaos rippling out of Washington. After all, Mr. Trump has promised not to cut Social Security benefits for the 73 million Americans enrolled.

But that promise has not insulated the Depression-era program once deemed the third rail of American politics. Thousands of worried and frustrated recipients have thronged local field offices, asking why the phone lines are jammed, whether their local offices will be closed by Elon Musk's team of software engineers and technology executives and whether they will lose their benefits.

Waves of buyouts and early retirements have hobbled the staff at many local offices, and recipients say it has become harder to use the agency's website and phone systems, or even be seen in person.

Where field offices are losing more than a quarter of their staff

This map shows only staff members who accepted the one-time buyout offer. It doesn't reflect those who opted into other programs, such as early retirement or deferred resignation.



Source: Social Security Administration • By Zach Levitt

Those difficulties come as a deadline looms, imposed under the influence of Mr. Musk's cost-cutting initiative called the Department of Government Efficiency as the billionaire presidential adviser crusades against what he imagines to be legions of beneficiaries who do not qualify for Social Security benefits. On April 14, the agency plans to largely phase out phone services for people filing for retirement

and survivor benefits or changing their direct deposit information, forcing them to file online or come into the office, part of the administration's broader effort to combat fraud that it has done little to prove exists.

The Social Security Administration could end up exempting some from the edict, but as April 14 approaches, calls to the agency have risen by 30 percent compared with last year, and more callers are getting busy signals or being disconnected, according to data published by Social Security.

"I didn't know he was going to pull this," said Teresa Boswell, whose vote for Mr. Trump in November helped flip Arizona, but who found herself fuming outside the Social Security office in Glendale last week, unable to sign up for \$1,200 in monthly benefits after she retired from her job processing legal papers. "This is a joke."

According to Liz Huston, a spokeswoman for the White House, "President Trump has made it clear that he is committed to making the federal government more efficient without compromising mission-critical operations. He has promised to protect Social Security, and every recipient will continue to receive their benefits."

The Social Security Administration did not respond to a request for comment.

The problems roiling the Social Security system stem from two of the Trump administration's central obsessions: slashing federal payrolls as quickly as possible and rooting out fraud in the federal government.

About 2,800 Social Security employees have taken buyouts or early retirements promoted by Mr. Musk's group, according to agency data.

Staffing levels at the Social Security Administration were already at 50-year lows, and the departure of so many workers who answered phones and worked at field-office counters has led to longer lines and phone waits, according to interviews with more than a dozen internal field office and high-level employees.

In the small town of Wisconsin Rapids, the field office is losing seven employees, more than half of its 11-person staff.

“They lost a good portion of the people that do the most complicated work,” said Greg Bachinski, an official with the local unit of the federal workers union.

All told, more than three dozen offices are losing at least a quarter of their employees, with many located in rural areas that supported Mr. Trump, according to the agency.

Are you a federal worker? We want to hear from you.

The Times would like to hear about your experience as a federal worker under the second Trump administration. We may reach out about your submission, but we will not publish any part of your response without contacting you first.

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Further job cuts are likely: The Social Security Administration has said it wants to shed 7,000 of its 57,000 employees, with the additional cuts coming from headquarters. Mr. Musk’s team is pushing to cut departments that perform key services like technology support by 50 percent or more, according to people familiar with the matter.

At the same time, the intense focus by Mr. Musk’s team on weeding out fraud within Social Security — while top administration officials continue to circulate misinformation about fraud levels — has led to policy announcements that have caused beneficiaries to worry they might lose access to the system or have their benefits cut.

Reducing fraud, particularly involving direct deposits, has long been a focus at the agency, with teams working on minimizing the consequences and costs of scams. But the problems reported have been small in scale compared to the size of the agency and total payments made.

The April 14 requirement for online applications does not apply to people seeking disability benefits, Supplemental Security Income, or Medicare. But many seeking benefits have no clear understanding of what is happening or what is being asked of them.

The White House has grown worried enough about the political fallout from the long lines and wait times that White House officials are pressuring Social Security administrators to reduce the information they put online that could draw attention to problems, according to a person briefed on the discussions.

But increasingly, the public knows about the issues. Virender Kanwal, a biology professor in New Jersey, applied for retirement benefits online at the end of February, a few months before her 70th birthday. She said she knew she would have to provide proof of her citizenship to complete the process but did not want to risk mailing in her passport, so she planned to visit a field office. To do so, she needed an appointment, and those need to be secured over the phone.

Ms. Kanwal said she called daily for weeks but never got through. Each time, a recorded message said there was a two-hour wait and to call back later, and the call disconnected. Then she received a letter in late March saying her application would be denied if she did not provide her documents within 12 days.

She began calling every few minutes, and said she was eventually placed on hold for six and a half hours before an agent finally answered just before midnight and gave her an appointment.

“This is not what we expect from our country,” Ms. Kanwal said.

In Poughkeepsie, N.Y., a 90-year-old man using a walker came to a field office because he thought he had to prove he was still alive. In Clinton, S.C., a woman with one leg fell down in the parking lot after coming into the office to show her identification.

In Southern California, older people with disabilities are spending hours taking public buses to get to Social Security offices only to be turned away, nonprofit groups said.

“People just don’t know what’s going to happen,” said Bob Kelley, founder of the San Diego Seniors Foundation. “Everything is up in the air, so it’s just confusion right now.”

Some services offered on the agency's website have also been crashing more often because a new anti-fraud measure has overloaded the servers, according to employees briefed on the matter.

Jessica LaPointe, president of the American Federation of Government Employees Council 220, which represents agency workers nationwide, said system outages were common, but that "it is unusual that they are happening at this frequency." To be sure, the technical systems the offices use are old and complex, and employees experienced periodic outages in the past, but the current changes have been far more disruptive, according to employees and advocates.

The agency has tried to address longer lines and phone waits by giving workers out of the agency's Baltimore-area headquarters the option to relocate to offices in the field. So far, around 2,200 have accepted, the agency has said.

The agency's acting commissioner, Leland Dudek, has broadcast some of the frustrations. Shortly after taking office, he began posting videos of Social Security's regular meetings on YouTube, an apparent effort to make the agency's operations more transparent.

During the meetings, Social Security officials candidly acknowledged that visitors were having trouble using the agency's online portal, My SSA, and were visiting field offices in large numbers because they were "afraid of our systems going down." They also discussed wanting the White House to make a statement to help calm people's fears.

"Can you ask the White House press secretary if she wants to record a blurb and get the message out there?" Mr. Dudek, a midlevel fraud official at the agency who was elevated to be Social Security's temporary chief, asked his staff in a March 28 operational meeting.

That never happened.

Many of the people waiting without appointments outside the Glendale office last week trickled away after getting the printout telling them how to schedule an appointment. But Bonnie Baum, 68, a resident of the sprawling 55-and-older

community Sun City West, decided to stick it out in the hopes of talking to someone.

She said her application for \$1,800 in monthly retirement benefits had been rejected because she did not file the paperwork on time. She had been unable to reach anyone on the phone, and said she had enough difficulty navigating her smartphone, much less Social Security's online system.

"It's just a mess," she said. Then she sat down and waited.

Christina Morales, Mitch Smith and Soumya Karlamangla contributed reporting.

Jack Healy is a Phoenix-based national correspondent who focuses on the fast-changing politics and climate of the Southwest. He has worked in Iraq and Afghanistan and is a graduate of the University of Missouri's journalism school.

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